employees for as long a time as larger stations. This finding also lends credence to the civil rights organizations' contention that small stations are a point of entry from which newcomers to the industry advance to larger stations as they develop their careers.

2. EEO Program Attributes' Internal Correlations (Research Question 5)

The most significant fact apparent from this data is that eleven of the fifteen potential pairs of the six EEO program attributes revealed a statistically significant correlation. In particular, stations which used a large number of referral sources tended to have more productive sources for minorities (variables H and I; $r = 0.2962$; $p \leq 0.012$); those with productive sources for minorities tended to have productive sources for women (variables I and J; $r = 0.8931$; $p \leq 0.0005$, nearly the strongest correlation between any two variables in the study); those with large numbers of referral sources also tended to offer training or internships (variables H and Y; $r = 0.3459$; $p \leq 0.003$) and to have participated in job fairs (variables H and Z; $r = 0.3645$; $p \leq 0.002$); and those offering training and internships were more likely to have participated in job fairs (variables Y and Z; $r = 0.5577$; $p \leq 0.0005$).

Discussion:

This finding demonstrates that one type of station consistently does nothing to comply with EEO requirements, and another type of station -- a "superperformer" -- does everything to comply with EEO requirements.

3. EEO Success Attributes' Internal Correlations (Research Question 6)

Apart from unremarkable information,[30/] the data yielded two findings.

First, the minority proportion of referrals was correlated with the minority percentage of parity for fulltime employees (variables N and HH1; $r = 0.3667$; $p \leq 0.024$). There was a near statistically significant correlation between the minority proportion of referrals and minority top four category employment percentage of parity as well (variables N and DD1; $r = 0.3216$; $p \leq 0.052$). See Figures 2 and 3 (on pp. 23-24). As discussed below, it is noteworthy that the number of minority referrals was not correlated with minority top four category or fulltime employment percentage of parity.

Second, the number of fulltime minority hires and the minority proportion of fulltime hires were each correlated with minority fulltime employment percentage of parity (variables U and HH1; $r = 0.3578$; $p \leq 0.022$, and variables V and HH1; $r = 0.3438$; $p \leq 0.037$).

30/ E.g., that the number of minority referrals was correlated with the number of minorities hired.

FIGURE 2

RELATIONSHIP BETWEEN MINORITY PROPORTION OF REFERRALS AND MINORITY TOP FOUR CATEGORY EMPLOYMENT PERCENTAGE OF PARITY

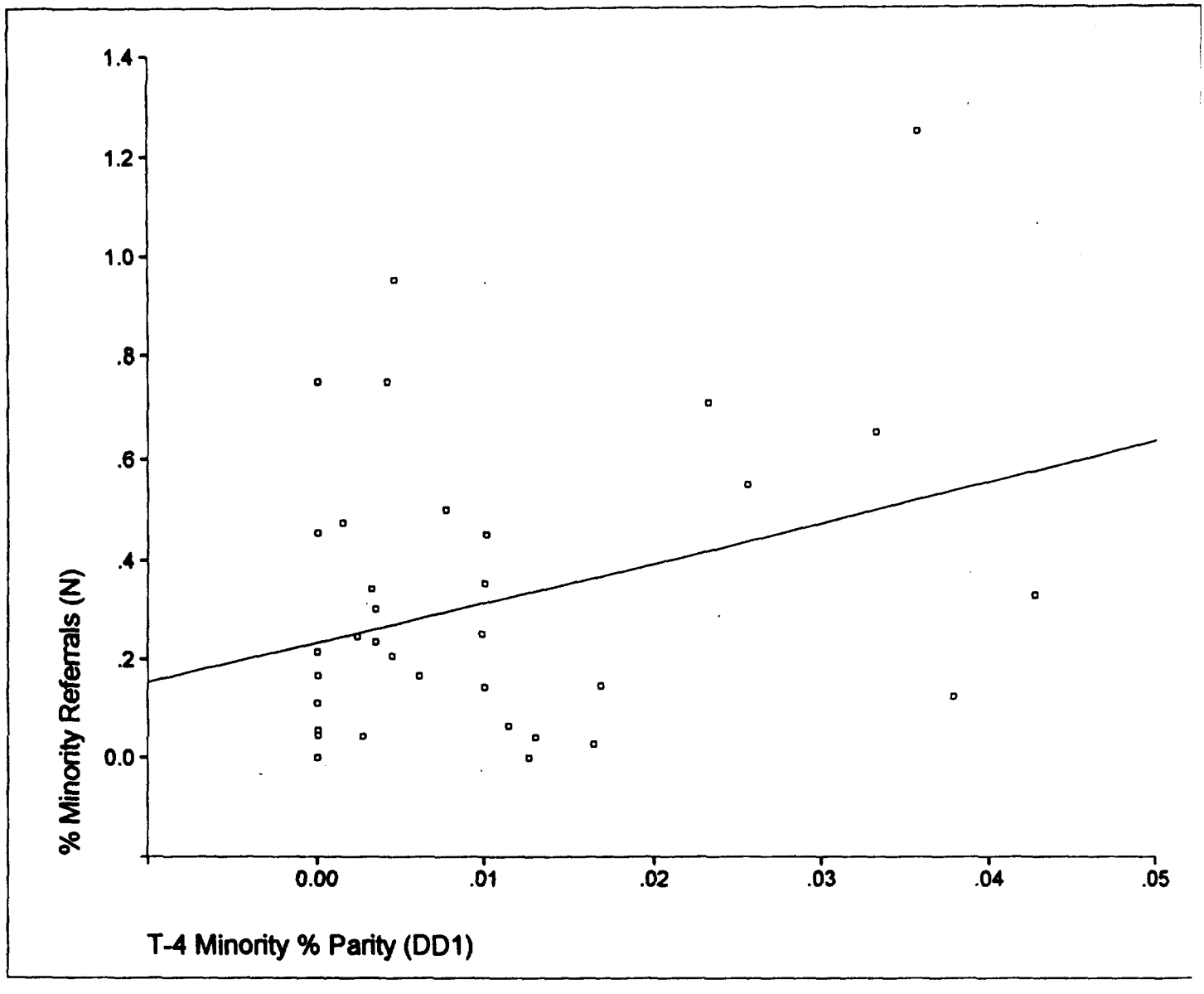
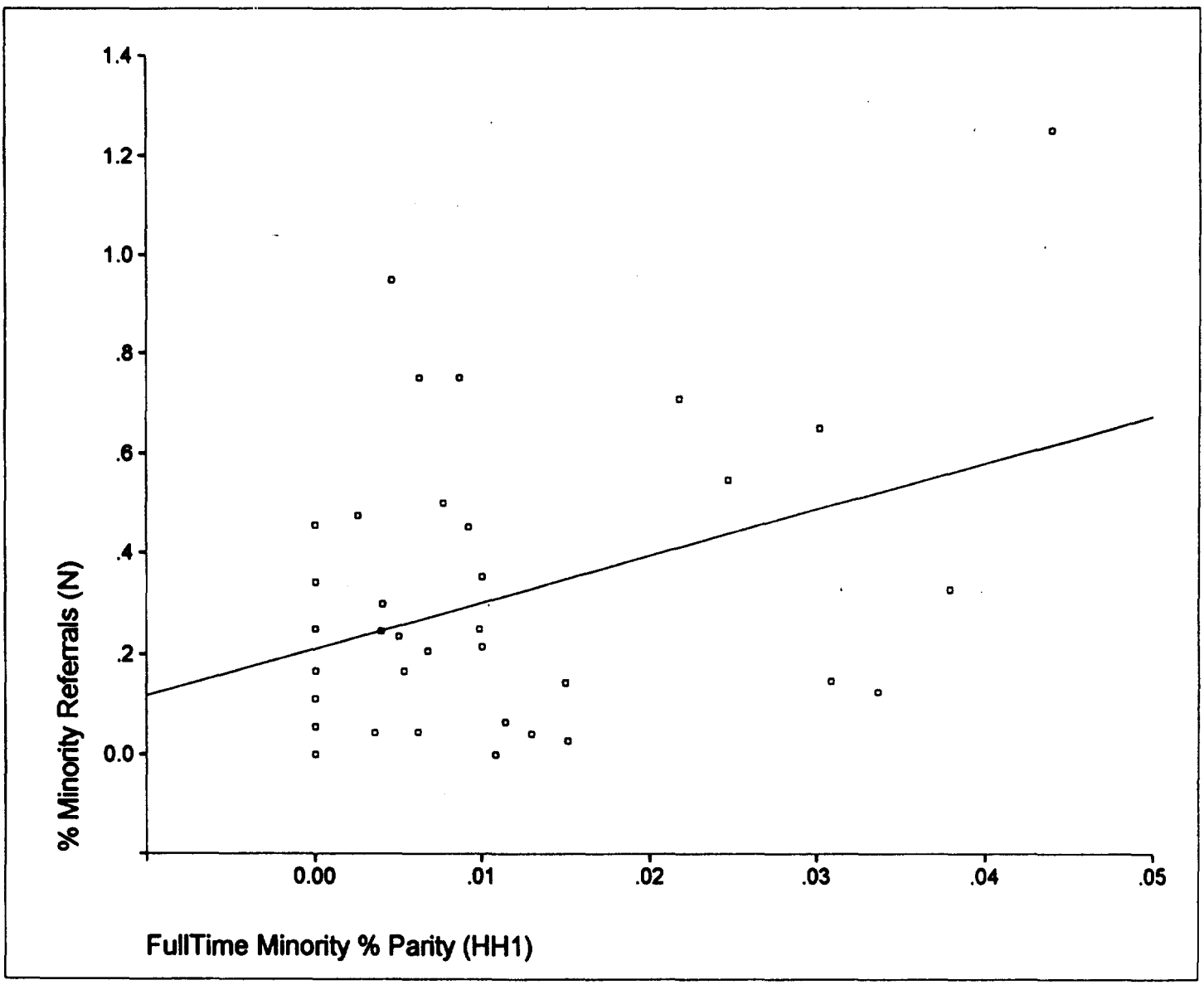


FIGURE 3

RELATIONSHIP BETWEEN MINORITY PROPORTION OF REFERRALS AND MINORITY FULLTIME EMPLOYMENT PERCENTAGE OF PARITY



Discussion:

The finding that the minority proportion of referrals was correlated with minority employment percentage of parity -- but the raw number of minority referrals was not correlated with minority employment percentage of parity -- underscores the importance of attracting an applicant pool which is representative of the population. Minorities must not only be present in the applicant pool, they must be more than tokens who are numerically overwhelmed by other applicants.

4. Station or Market Attributes' Correlations with EEO Program Attributes (Research Question 7)

Stations using the largest number of referral sources tended to be in large markets (variables H and E; $r = 0.4099$; $p \leq 0.0005$) and in racially diverse markets (variables H and F; $r = 0.2576$; $p \leq 0.022$), and tended to have large numbers of top four category hires (variables H and O; $r = 0.3297$; $p \leq 0.004$), large numbers of fulltime hires, (variables H and T; $r = 0.2612$; $p \leq 0.023$), large top four category staffs (variables H and BB; $r = 0.3903$; $p \leq 0.003$) and large fulltime staffs (variables H and FF; $r = 0.4502$; $p \leq 0.0005$). The number of referral sources was correlated with top four category or fulltime turnover rates.

Stations having the most productive sources for minorities tended to be in large markets (variables I and E; $r = 0.3220$; $p \leq 0.006$) and in racially diverse markets (variables I and F; $r = 0.3685$; $p \leq 0.002$), and tended to have large numbers of top four category hires (variables I and O; $r = 0.2667$; $p \leq 0.026$) and large numbers of fulltime hires (variables I and T; $r = 0.3234$; $p \leq 0.006$). Stations having the most productive sources for women

also tended to be in large markets (variables J and E; $r = 0.2615$; $p \leq 0.023$) and tended to have large numbers of top four category hires (variables J and O; $r = 0.2990$; $p \leq 0.009$) and large numbers of fulltime hires (variables J and T; $r = 0.3234$; $p \leq 0.004$). The variables measuring the productivity of referral sources were not correlated with staff size or with top four category or fulltime turnover rates.

Stations offering training or internships tended to be those with the largest number of top four category hires (variables Y and O; $r = 0.4065$; $p \leq 0.0005$), the largest number of fulltime hires (variables Y and T; $r = 0.3940$; $p \leq 0.001$), the largest top four category staffs (variables Y and BB; $r = 0.5252$; $p \leq 0.0005$), and the largest fulltime staffs (variables Y and FF; $r = 0.5237$; $p \leq 0.0005$). Stations which participated in jobs fairs also tended to be those with the largest number of top four category hires (variables Z and O; $r = 0.2302$; $p \leq 0.005$), the largest number of fulltime hires (variables Z and T; $r = 0.3511$; $p \leq 0.002$) and the largest fulltime staffs (variables Z and FF; $r = 0.2938$; $p \leq 0.035$). Participation in job fairs presented a near statistically significant correlation with top four category staff size (variables Z and BB; $r = 0.2730$; $p \leq 0.053$). Market size and market racial diversity were not correlated with the offering of training or internships or with participation in job fairs.

Discussion:

The fact that staff size was correlated with the number of referral sources but not with the number of productive referral sources indicates that many large stations apparently use their resources to propound long lists of local organizations which may

or may not be cultivated as genuine sources of minority or female referrals.

It is unfortunate that turnover rate was not correlated with a station's use of referral sources and development of productive referral sources. Stations with high turnover rates are probably most in need of fresh sources of applicants who are willing and able to remain on the job for extended periods of time. A high turnover rate is often a symptom of poor management, which may also account for these stations' failure to develop a wide variety of productive referral sources.

5. Station or Market Attributes' Correlations with EEO Success Attributes (Research Question 8)

The number and proportion of minority referrals (data which was not broken down by top four category and fulltime jobs) were each correlated with market size (variables L and E; $r = 0.4640$; $p \leq 0.0005$, and variables N and E; $r = 0.3219$; $p \leq 0.009$) and with market racial diversity (variables L and F; $r = 0.4558$; $p \leq 0.0005$ and variables N and F; $r = 0.5348$; $p \leq 0.0005$), but not with the number of top four category or fulltime hires, top four category or fulltime staff size, or top four category or fulltime turnover rates.

The number of female referrals (again, not broken down by top four category and fulltime jobs) was correlated with market size (variables M and E; $r = 0.4429$; $p \leq 0.0005$), the number of top four category hires (variables M and O; $r = 0.3299$; $p \leq 0.004$), the number of fulltime hires (variables M and T; $r = 0.4256$; $p \leq 0.0005$), top four category staff size (variables M and BB; $r = 0.3802$; $p \leq 0.004$) and fulltime staff size (variables M and FF;

$r = 0.4031$; $p \leq 0.002$), but not with top four category and fulltime turnover rates.

The number of top four category minority hires was correlated with market size (variables P and E; $r = 0.4729$; $p \leq 0.0005$), market racial diversity (variables P and R; $r = 0.6332$; $p \leq 0.0005$) and staff size (variables P and BB; $r = 0.2855$; $p \leq 0.040$), but not with turnover rate. The number of fulltime minority hires was correlated with market size (variables U and E; $r = 0.3962$; $p \leq 0.0005$) and market racial diversity (variables U and F; $r = 0.6529$; $p \leq 0.0005$), but not with staff size or turnover rate.

The minority proportion of top four category hires was correlated with market size (variables Q and E; $r = 0.3874$; $p \leq 0.0006$) and market racial diversity (variables Q and F; $r = 0.6689$; $p \leq 0.0005$), but not with staff size, the number of hires, or turnover rate. The minority proportion of fulltime hires was correlated with market size (variables V and E; $r = 0.3177$; $p \leq 0.008$) and market racial diversity (variables V and F; $r = 0.6411$; $p \leq 0.0005$), but not with staff size, the number of hires, or turnover rate.

The number of top four category female hires was correlated with market size (variables R and E; $r = 0.3548$; $p \leq 0.002$) staff size (variables R and BB; $r = 0.3173$; $p \leq 0.019$) and turnover rate (variables R and II; $r = 0.6470$; $p \leq 0.0005$ and variables R and JJ; $r = 0.4006$; $p \leq 0.002$). The number of fulltime female hires was correlated with market size (variables W and E; $r = 0.3543$; $p \leq 0.002$) and staff size (variables W and FF; $r = 0.2821$; $p \leq 0.039$). The number of fulltime female hires presented a near statistically significant correlation with turnover rate (variables W and JJ; $r = 0.2560$; $p \leq 0.059$).

The female proportion of top four category hires was not correlated with market size, staff size and turnover rate, but it was correlated with the number of top four category hires (variables S and O; $r = 0.3574$; $p \leq 0.009$). The female proportion of fulltime hires was correlated with no applicable station or market attribute.

Minority top four category and fulltime employment percentages of parity, and minority applicant pool percentage of parity, were correlated with no station or market attributes.

Discussion:

The number and proportion of minority referrals were each correlated with market size and market racial diversity, but were not correlated with staff size, number of hires or turnover rate. However, the number of female referrals was correlated with staff size and number of hires, as well as market size. Furthermore, the number and proportion of top four category female hires was correlated with staff size, as well as market size. This means that stations recruit and hire women in proportion to the stations' employment needs, but neither recruit nor hire minorities in proportion to the stations' employment needs.

The finding that no station or market attribute (including market size and demographics and staff size) was correlated with minority employment percentage of parity illustrates that EEO achievements and failures occur irrespective of demographics and station size.

6. EEO Program Attributes' Correlations with EEO Success Attributes (Research Question 9)

The number of referral sources was correlated with the number of female referrals (variables H and M; $r = 0.3324$; $p \leq 0.003$), but not with the number of minority referrals. The number of referral sources was also correlated with the number of top four category minority hires (variables H and P; $r = 0.3367$; $p \leq 0.004$) and the number of top four category female hires (variables H and R; $r = 0.2579$; $p \leq 0.023$) but with no other EEO success attributes.

The number of productive minority referral sources was correlated with the number of minority referrals (variables I and L; $r = 0.4180$; $p \leq 0.0005$) and the minority proportion of referrals (variables I and N; $r = 0.3177$; $p \leq 0.011$), the number of top four category minority hires (variables I and P; $r = 0.3343$; $p \leq 0.005$), the number of fulltime minority hires (variables I and U; $r = 0.4270$; $p \leq 0.0005$), and the minority proportion of fulltime hires (variables I and V; $r = 0.3149$; $p \leq 0.011$).

The number of productive female referral sources was correlated with the number of female referrals (variables J and M; $r = 0.5397$; $p \leq 0.0005$).

The offering of training or internships was correlated with the number of top four category minority hires (variables Y and P; $r = 0.2755$; $p \leq 0.020$), the number of top four category female hires (variables Y and R; $r = 0.3747$; $p \leq 0.001$), and the number of fulltime female hires (variables Y and W; $r = 0.3101$; $p \leq 0.007$), but not with the number of fulltime minority hires.

Participation in job fairs was correlated with the number of minority referrals (variables Z and L; $r = 0.2715$; $p \leq 0.026$), the number of female referrals (variables Z and M; $r = 0.3306$; $p \leq 0.005$), the number of top four category minority hires (variables Z and P; $r = 0.2797$; $p \leq 0.020$), the number of top four category female hires (variables Z and R; $r = 0.2923$; $p \leq 0.013$) and the number of fulltime minority hires (variables Z and U; $r = 0.2405$; $p \leq 0.045$), but not with the number of fulltime female hires. Participation in job fairs was correlated with the minority applicant pool percentage of parity (variables Z and MM1; $r = 0.3181$; $p \leq 0.045$).

No EEO program attribute was correlated with minority top four category percentage of parity or minority fulltime employment percentage of parity.

Discussion:

It is necessary first to consider that correlations between an EEO program attribute variable and an EEO success variable may not reflect the influence of one variable on the other, but may instead manifest the influence of a third variable (the "controlling variable") which drives both the EEO program attribute variable and the EEO success variable. If there are such controlling variables, they are most likely to be market size and

station size.[31/] Set out in Table 5 is a list of the EEO program attribute variables and EEO success variables, indicating which of them was correlated with market size or station size.

TABLE 5

CORRELATIONS BETWEEN MARKET SIZE OR STATION SIZE AND EEO PROGRAM ATTRIBUTE AND EEO SUCCESS VARIABLES

Variable Name and Description		Correlation with Market Size (Variable E)	Correlation with Station Size (Variable BB or FF)
H:	Number of Referral Sources	Yes	Yes
I:	Number of Productive Minority Referral Sources	Yes	No
J:	Number of Productive Female Referral Sources	Yes	No
K:	Number of Productive Minority or Female Referral Sources	Yes	No
Y:	Offering Training or Internships	No	Yes
Z:	Job Fair Participation	Yes	Yes
L:	Number of Minority Referrals	Yes	No
M:	Number of Female Referrals	Yes	Yes
N:	Minority Proportion of Referrals	Yes	No
P:	Number of Top Four Category Minority Hires	Yes	Yes

31/ In Tennessee, owing to the urbanization of the Black population, minority population size and the percentage of minorities in the population are each closely correlated with market size (variables F and E; $r = 0.6007$; $p \leq 0.0005$, and variables G and E; $r = 0.8079$; $p \leq 0.0005$). Stations in a large market without a large minority population can readily induce minorities to relocate. Consequently, market size, rather than minority population size or the percentage of minorities in the population, is the most logical controlling variable.

TABLE 5 (continued)

Variable Name and Description	Correlation with Market Size (Variable E)	Correlation with Station Size (Variable BB or FF)
Q: Minority Proportion of Top Four Category Hires	Yes	No
R: Number of Top Four Category Female Hires	Yes	Yes
S: Female Proportion of Top Four Category Hires	No	No
U: Number of Fulltime Minority Hires	Yes	No
V: Minority Proportion of Fulltime Hires	Yes	No
W: Number of Fulltime Female Hires	Yes	Yes
X: Female Proportion of Fulltime Hires	No	No
AA: Number of Top Four Category Minority Employees	Yes	Yes
CC: Minority Proportion of Top Four Category Employees	Yes	No
DD1: Minority Top Four Category Employment Percentage of Parity	No	No
EE: Number of Fulltime Minority Employees	Yes	Yes
GG: Minority Proportion of Fulltime Employees	Yes	Yes
HH1: Minority Fulltime Employment Percentage of Parity	No	No
MM1: Minority Applicant Pool Percentage of Parity	No	No

The fact that market size or station size happened to be correlated with a particular EEO program attribute or EEO success attribute does not necessarily mean that market size or station size controls that variable. However, such a correlation should cause the researcher to hesitate before suggesting that a particular EEO success attribute may be dependent on a particular EEO program attribute. Such caution is particularly indicated if market size or station size were correlated with both variables of a pair consisting of an EEO program attribute and an EEO success attribute.32/

Bearing this in mind, we cannot conclude with certainty that the number of referral sources or the number of productive referral sources governs any EEO success variable, owing to the possibility that market size governs both variables.

Nor can we conclude with certainty that the offering of training or internships correlated meaningfully with the number of minority or female hires, since station size may govern both variables.

Nor can we conclude with certainty that participation in job fairs correlated meaningfully with the number of minority or female referrals or the number of minority or female hires, since market size (and in some cases station size) may govern both variables.

However, the correlation between participation in job fairs and minority applicant pool percentage of parity appears to be genuine. Minority applicant pool percentage of parity was not

---

32/ This kind of data can be manipulated to exclude the impact of a controlling variable. However, our data had an insufficient number of cases to yield the cell sizes required for this type of analysis.

correlated with either market size or station size. Furthermore, this correlation is logical and direct: a station participates in job fairs specifically in order to attract minority applicants. Apparently, the strategy works.

This finding lends support to the FCC's contention that the use of job fairs may be a useful alternative means to insure that minorities are more proportionally represented in applicant pools.33/

Finally, the absence of any correlation between any EEO program attribute and minority employment percentages of parity may mean either of two things: (1) that the EEO program activities we studied are not intensive enough to bring about long term changes in minority employment, or (2) that many of the stations which reported significant EEO program initiatives in their 1996 EEO programs (used in our database) did so because they knew that the minority employment percentages of parity on the 1995 Form 395's (also used in our database) were deficient and that remedial steps were needed before license renewal time.

33/ EEO Streamlining, supra, 11 FCC Rcd at 5166 ¶24.

Conclusions

The principal conclusions of this study are as follows:

1. Proposals to deregulate EEO compliance for "small" stations would exempt 45% of the currently non-exempt Tennessee stations if the size cutoff were ten fulltime employees, 58% of the currently non-exempt Tennessee stations if the size cutoff were fifteen fulltime employees and 70% of the currently non-exempt Tennessee stations if the size cutoff were twenty fulltime employees. If the Commission evaluated staff size based on the number of top four category employees rather than the number of fulltime employees, a ten employee cutoff would exempt 47% of the currently non-exempt Tennessee stations, a fifteen employee cutoff would exempt 62% of the currently non-exempt Tennessee stations, and a twenty employee cutoff would exempt 70% of the currently non-exempt Tennessee stations.

2. Proposals to deregulate EEO compliance for "small market stations" would exempt 7.6% of the currently non-exempt Tennessee stations if the market size floor were 20,000, 12.9% of the currently non-exempt Tennessee stations if the market size floor were 25,000, 37.6% of the currently non-exempt Tennessee stations if the market size floor were 50,000, and 44.8% of the currently non-exempt Tennessee stations if the market size floor were 100,000.

3. Proposals to deregulate EEO compliance for stations in markets with "small minority populations" must be evaluated by first recognizing that 33.0% of Tennessee stations are not required to have an EEO program for minorities, inasmuch as they are situated in markets with less than 5% minority population. If minority population percentage were used to trigger an EEO compliance exemption, and the minority population percentage floor were set at 10%, 56% of Tennessee's stations would be exempt. If the minority population percentage floor were set at 20%, 88% of Tennessee's stations would be exempt.

4. The majority of stations are essentially exempt from detailed EEO review now, owing to nothing more than the presence of a low turnover rate in the reporting year. Fifty-eight percent of the stations reported three or fewer top four category hires during the reporting year, and 34% reported three or fewer fulltime hires during the reporting year. Virtually no stations whose Form 396 EEO programs reported three or fewer hires have ever been the subject of a Bilingual investigation, irrespective of how many persons had been hired in earlier years or how many persons are likely to be hired in subsequent years.

5. If the Commission shifts its enforcement emphasis from fulltime jobs to top four category jobs, it will need to expand the reporting period (e.g. from one year to four years) in order to obtain the same volume of hiring data on top four category employment which it now obtains for fulltime employment. This follows from our observations of job turnover rates, which showed that turnover was far more commonplace in the bottom five categories than in the top four categories. While 32% of the stations filing Form 396 reported no top four category hires during the reporting year, only 8% reported no fulltime hires during the reporting year. The median number of top four category hires was three. However, the median number of fulltime hires was six, even though the vast majority of all employees work in the top four categories, as shown by the fact that the median number of top four category employees was eleven and the median number of fulltime employees was twelve. The majority of the stations' top four category job turnover rates were rather low, with 62% of the stations turning over less than 25% of the number of employees they reported in the top four categories, although 38% of the stations turned over less than 25% of the number of fulltime employees they reported. The median percentage of top four category staff which turned over was 9% and the median percentage of fulltime staff which turned over was 33%.

6. A good many stations are escaping Commission scrutiny for obvious potential EEO violations. Six percent of stations reported the use of no referral sources at all and 24% reported no sources which produced minority referrals. Moreover, the median number of productive minority sources was only two. However, 11% of the stations reported five or more productive sources of minority referrals, and 25% of the stations reported five or more productive sources of female referrals. Thus, a handful of stations may well be EEO "superperformers", while the majority of the stations operated EEO programs which were of only marginal effectiveness. This conclusion is also supported by evidence that eleven of the fifteen potential pairs of the six EEO program attributes revealed a statistically significant correlation. Stations which used a large number of referral sources tended to have more productive sources for minorities; those with productive sources for minorities tended to have productive sources for women; those with large numbers of referral sources also tended to offer training or internships and to participate in job fairs; and those offering training and internships were more likely to participate in job fairs.

7. Only 27% of the stations reported offering training or internships, and only 12% of the stations reported participation in a job fair. These low numbers for participation in optional but obviously useful EEO initiatives suggest that an EEO regime premised on "self-regulation" would be a failure.

8. A surprisingly high proportion of the stations which reported minority referral data (25%) reported not one minority referral in the entire reporting year. With the median number of minority referrals being four in a year, it is apparent that the majority of the stations should be doing much more to encourage minorities to apply for employment. This conclusion is underscored by the fact that minorities comprised less than 5% of the applicant pool at 30% of the stations, and less than 10% of the applicant pool at 41% of the stations. Furthermore, 27% of the stations had not attained 50% of parity with the workforce in the composition of their applicant pools, even though the pools included applicants for secretaries and janitors.

9. Ten percent of the stations reported no female referrals in the reporting year, and sixteen percent received three or fewer female referrals. Thus, a good many stations should be doing much more to encourage women to apply for employment.

10. The fact that five stations each generated more than fifty minority applicants demonstrates that minority applicants are in plentiful supply. Apparently, minorities are attracted to the stations which have built a reputation for employing them. Similarly, the fact that twelve stations each generated more than fifty female applicants demonstrates that female applicants are in plentiful supply. The fact that the same pattern of high recruitment numbers for a handful of stations obtained for women as obtained for minorities demonstrates that the high number of minority applicants at a handful of stations cannot be attributed to format considerations alone.

11. The measures of percentage of parity attained for minority employment shows that substantial progress is yet to be made for top four category positions. While the median minority fulltime employment percentage of parity was 64%, the median minority top four category percentage of parity was only 46%. This means that approximately half of the radio stations in Tennessee have failed even the FCC's lenient "zone of reasonableness" test used to determine whether thorough review of their EEO programs is needed to exclude the possibility that their stations might be discriminating.

12. Turnover rate for fulltime employees was negatively correlated with fulltime staff size. This finding demonstrates that larger stations tended to retain employees relatively longer than do small stations. On the one hand, this means that statistical review of small stations' EEO performance may be had by reviewing minority and female hiring over a period of years. On the other hand, this finding lends credence to some broadcasters' contention that smaller stations (perhaps because or lower pay or less competent management) do not retain employees for as long a time as larger stations. This finding also lends credence to civil rights organizations' contention that small stations are a point of entry from which newcomers to the industry advance to larger stations as they develop their careers.

13. The finding that the minority proportion of referrals was correlated with minority employment percentage of parity -- but the raw number of minority referrals was not correlated with minority employment percentage of parity -- underscores the importance of attracting an applicant pool which is representative of the population. Minorities must not only be present in the applicant pool, they must be more than tokens who are numerically overwhelmed by other applicants.

14. The finding that no station or market attribute (including market size and demographics and staff size) was correlated with minority employment percentage of parity illustrates that EEO achievements and failures occur irrespective of demographics and station size.

15. The fact that staff size was correlated with the number of referral sources but not with the number of productive referral sources indicates that many large stations apparently use their resources to propound long lists of local organizations which may or may not be cultivated as genuine sources of minority or female referrals.

16. The correlation between participation in job fairs and minority applicant pool percentage of parity suggests that stations participating in job fairs are succeeding in building applicant pools in which minorities are better represented. This finding lends support to the FCC's contention that the use of job fairs may be a useful alternative means to insure that minorities are more proportionally represented in applicant pools.

* * * * *

APPENDIX A

Appendix A

Variables Analyzed for "EEO Programs And EEO Performance At Tennessee Radio Stations"

The following table lists each variable studied, the letter (e.g., E, FF) we assigned to it, and the method and units used to measure it. Some variable names are not included in the table because they were station identifiers, were dummy variables used to compute other variables, or were associated with variables which could not be used owing to an insufficient number of cases.

Station or Market Attributes

Variable Name and Description	Measurement or Scale of Variable
E: Market Size	Number of persons, drawn from the 1990 Census, for the MSA in which the station is located, or, if the station is not in an MSA, for the county in which the station is located (following FCC market definition practice)
F: Market Racial Diversity (percentage of minorities in the market)	Percentage of minorities in the market, to nearest 0.01; this variable's boundaries run from 0.00 to 100.00.
G: Market Minority Population	Number of minority persons in the market. See Variable E (Market Size) for market definition.
O: Number of Top Four Category Hires (number of persons hired for fulltime, top four category positions)	Taken from Form 396, §IV, second line; reflects one year of hiring
T: Number of Fulltime Hires (number of persons hired for fulltime positions)	Taken from Form 396, §IV, first line; reflects one year of hiring
BB: Number of Top Four Category Employees (number of persons employed in fulltime, top four category positions)	From EEO Trend Report - 1995, line one, column one
FF: Number of Fulltime Employees (number of persons employed in fulltime positions)	From EEO Trend Report - 1995, line three, column one

Variable Name and Description		Measurement or Scale of Variable
II	Top Four Category Turnover Rate (number of fulltime, top four category hires in a year divided by four category staff size)	O/BB. Coded to nearest 0.01; this variable's lower boundary is 0.00
JJ	Fulltime Turnover Rate (number of fulltime persons hired in a year divided by fulltime staff size)	T/FF. Coded to nearest 0.01; this variable's lower boundary is 0.00

EEO Program Attributes

H:	Number of Referral Sources	Taken from Form 396, Section III, and exhibits to Form 396 which were referred to in Section III
I:	Number of Productive Minority Referral Sources	Number of referral sources (Variable H) which generated at least one minority referral
J:	Number of Productive Female Referral Sources	Number of referral sources (Variable H) which generated at least one female referral
K:	Number of Productive Minority or Female Referral Sources	Number of referral sources (Variable H) which generated at least one minority or female referral
Y:	Offering Training or Internships	Coded 0 if Form 396 (including especially §VIII and exhibits) did not mention any station training or internships, or only stated that it plans to perform training or offer internships in the future, or offers scholarships not tied to training or an internship; coded 1 if the station performed training or offered internships
Z:	Job Fair Participation	Coded 0 if Form 396 (including especially §VIII and exhibits) did not mention station participation in job fairs, or only stated that it plans to participate in job fairs in the future; coded 1 if the station participated in job fairs

EEO Success Attributes

L:	Number of Minority Referrals	Number of minorities referred by the sources in Variable H

Variable Name and Description		Measurement or Scale of Variable
M:	Number of Female Referrals	Number of women referred by the sources in Variable H
N:	Minority Proportion of Referrals (approximate proportion of referrals who are minorities)	Estimated to be L/2M, on the assumption that approximately half of job referrals are women. */ Coded to nearest 0.01; this variable's lower boundary is 0.00
P:	Number of Top Four Category Minority Hires	Taken from Form 396, §IV, second line; reflects one year of hiring
Q:	Minority Proportion of Top Four Category Hires (proportion of persons hired for fulltime, top four category positions who are minorities)	P/O. Coded to the nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000
R:	Number of Top Four Category Female Hires	Taken from Form 396, §IV, second line; reflects one year of hiring
S:	Female Proportion of Top Four Category Hires (proportion of persons hired for fulltime, top four category positions who are women)	R/O. Coded to the nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000
U:	Number of Fulltime Minority Hires	Taken from Form 396, §IV, first line; reflects one year of hiring
V:	Minority Proportion of Fulltime Hires (proportion of persons hired for fulltime positions who are minorities)	U/T. Coded to the nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000
W:	Number of Fulltime Female Hires	Taken from Form 396, §IV, first line; reflects one year of hiring
X:	Female Proportion of Fulltime Hires (proportion of persons hired for fulltime positions who are women)	W/T. Coded to the nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000

---

*/ See Community Communications, Inc., 11 FCC Rcd 5266, 5267 ¶10 (1996) (describing calculation.)

Variable Name and Description	Measurement or Scale of Variable
AA: Number of Top Four Category Minority Employees (number of minorities employed in fulltime, top four category positions)	From EEO Trend Report - 1995, line one, column three
CC: Minority Proportion of Top Four Category Employees (proportion of persons employed in fulltime, top four category positions who are minorities)	AA/BB. Coded to nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000
DD1: Minority Top Four Category Employment Percentage of Parity (proportion of minorities in fulltime, top four category positions divided by the percentage of minorities in the market)	CC/F. Coded to nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000. In no case is BB, the number of top four category employees, less than 5, and in no case is F, the percentage of minorities in the market, less than 5.00.
EE: Number of Fulltime Minority Employees	From EEO Trend Report - 1995, line three, column three
GG: Minority Proportion of Fulltime Employees (proportion of persons employed in fulltime positions who are minorities)	EE/FF. Coded to nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000
HH1: Minority Fulltime Employment Percentage of Parity (proportion of minorities in fulltime positions divided by the percentage of minorities in the market)	GG/F. Coded to nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000. In no case is EE, the number of fulltime employees, less than 5, and in no case is F, the percentage of minorities in the market, less than 5.00.
MM1: Minority Applicant Pool Percentage of Parity (proportion of minorities in the applicant pool divided by the percentage of minorities in the market)	N/F. Coded to nearest 0.0001; this variable's boundaries are from 0.0000 to 1.0000. In no case is the number of referrals (estimated to be 2M, that is, double the number of female referrals) less than five, and in no case is F, the percentage of minorities in the market, less than 5.00.

APPENDIX B